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SOAH DOCKET NO. 473-19-6862 PUC DOCKET NO. 49737

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APPLICATION OF SOUTHWESTERN	§	BEFORE THE STATE OFFICE OF
ELECTRIC POWER COMPANY FOR	§	
CERTIFICATE OF CONVENIENCE	§	
AND NECESSITY AUTHORIZATION	§	ADMINISTRATIVE HEARINGS
AND RELATED RELIEF FOR THE	§	
ACQUISITION OF WIND	§	
GENERATION FACILITIES	§	

SOUTHWESTERN ELECTRIC POWER COMPANY'S PRIVILEGE INDEX FOR TEXAS INDUSTRIAL ENERGY CONSUMERS' SEVENTH SET OF REQUESTS FOR INFORMATION

Southwestern Electric Power Company (SWEPCO) provides the attached privilege index, marked as Attachment A, prepared in accordance with 16 Tex. Admin. Code (TAC) § 22.144(d)(2) for privileged information that is responsive to Request for Information (RFI) Nos. 7-15 and 7-16 in the Seventh Set of RFIs from Texas Industrial Energy Consumers (TIEC). Pursuant to an agreement between SWEPCO and TIEC, this privilege index is timely filed.

To date, SWEPCO has not identified any privileged documents responsive to this request other than the materials identified on the attached privilege index. SWEPCO recognizes that it is under a continuing obligation to supplement discovery responses. If SWEPCO identifies any additional privileged documents, it will provide a supplemental privilege index at that time.

Respectfully submitted,

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Stephanie Green

ATTORNEYS FOR SOUTHWESTERN ELECTRIC POWER COMPANY.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this motion was served on all parties of record this 8th day of November, 2019.

Stephanie Green

Item No.	RFI No.	Bates No.	Document Title (Date)	Preparer/ Custodian ¹	Recipients ¹	Privilege Claimed	Explanation
1	TIEC 7-15	000103	West Wind RFP (10/17/2018)	John C Crespo	Rhonda C Ryan, Joann S Worthington, Jerry Huerta, Melissa A Gage	Attorney-Client Communication; Work Product	Confidential communication regarding development of request for proposal and regulatory strategy prepared in anticipation of litigation
2	TIEC 7-16	000104	RE: West Wind Filing Numbers Walkthrough (6/21/2019)	Adam J Hickman	John C Crespo CC: Jack Fite, Joann S Worthington, Shelli A Sloan, Matthew J Satterwhite, Alex E Vaughan, Bill Allen, Tom Brice Jr., Matthew A Horeled, Antonio P Smyth, Matthew D Vermilion, Brian D Weber, Robert W Bradish, Kamran Ali,	Attorney-Client Communication; Work Product	Transmittal of confidential draft initial customer benefits analysis prepared at the request of counsel and in anticipation of litigation

¹ The following individuals are in-house counsel for American Electric Power Service Corporation ("AEPSC") and its affiliates: John C. Crespo, Rhonda C. Ryan, Joann S. Worthington, Melissa A. Gage, Jerry Huerta, Christen M Blend, and Jessica A. Cano. Outside counsel also representing SWEPCO or PSO includes Jack Fite and William Coe. All other preparers and recipients reflect AEPSC/SWEPCO/PSO or Brattle employees.

			•		Hannes Pfeifenberger, Akarsh Sheilendranath, Hank Steel, Mary Williamson, Lynn M Ferry-Nelson, John F Torpey, Jim Martin, Jon R Maclean, Joseph S Perez, John Aaron, Jacob A Miller, Judy Chang, Karl R Bletzacker, Christen M Blend, Jessica A Cano, Edward J Locigno, Rhonda C Ryan, Joseph A Karrasch, William Coe		
3	Tiec 7-16	000105- 000118	Customer Benefits Results and Assumptions_Final (6/21/2019)	Adam J Hickman	John C Crespo, Jack Fite, Joann S Worthington, Shelli A Sloan, Matthew J Satterwhite, Alex E Vaughan, Bill Allen, Tom Brice Jr., Matthew A Horeled, Antonio P Smyth, Matthew D Vermilion, Brian D Weber, Robert W Bradish, Kamran Ali, Hannes Pfeifenberger, Akarsh Sheilendranath,	Attorney-Client Communication; Work Product	Confidential draft initial customer benefits analysis prepared at the request of counsel and in anticipation of litigation

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	Hank Steel, Mary
	Williamson, Lynn M
	Ferry-Nelson, John F
	Torpey, Jim Martin, Jon
	R Maclean, Joseph S
	Perez, John Aaron, Jacob
	A Miller, Judy Chang,
	Karl R Bletzacker,
	Christen M Blend, Jessica
	A Cano, Edward J
	Locigno, Rhonda C
	Ryan, Joseph A Karrasch,
	William Coe